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July 18, 2022

VIA ECF
Honorable Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Cequel Communications, LLC d/b/a Suddenlink
Communications v. MOX Networks, LLC
Case No. 1:21-cv-05577

Dear Judge Buchwald,

Counsel for Plaintiff, Cequel Communications, LLC d/b/a Suddenlink Communications, and for Defendant, MOX Networks, LLC, jointly write to update the Court on the status of discovery in this matter, pursuant to the Revised Scheduling Order “so ordered” on June 24, 2022.

The parties have substantially completed their document productions, consisting of 22,067 documents on Plaintiff’s side and 16,482 documents on Defendant’s side, and are working jointly to schedule fact depositions. Each side has noticed four fact witnesses and served a Rule 30(b)(6) notice. We expect to complete fact depositions before the September 15, 2022 deadline for fact discovery in accordance with the Revised Scheduling Order.

In addition, Plaintiff has served five non-party document subpoenas, on notice to Defendant, and is coordinating with those non-parties for their responses and the timely production of the requested documents.

Thank you for your attention to this matter.

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